

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-30019-MAP
)	
ROBERT KNOWLES,)	
Defendant.)	
)	

**MOTION TO ENLARGE TIME FOR FILING OF GOVERNMENT'S RESPONSE TO
DEFENDANT'S REQUEST FOR DISCOVERY**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests this Court to enlarge the time for filing of the government's response to Defendant's request for discovery from September 21, 2004 to September 30, 2004.

In support of this motion, the government states the following:

1. The undersigned Assistant U.S. Attorney assumed responsibility for this case, from Special Assistant U.S. Attorney James Goodhines, on September 10, 2004.
2. The undersigned Assistant U.S. Attorney's competing caseload has prevented the government's response by September 21, 2004, as the government needs more time to review the above captioned case, meet with the case agent, and respond to the Defendant's discovery motion.
3. The Defendant, through his counsel, Attorney Alan Jay Black, has assented to this request by the government.

This request does not cause undue delay, and is in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: s/ Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney